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To: [Gregory Orehowsky/DC/USEPA/US@EPA](mailto:Gregory.Orehowsky/DC/USEPA/US@EPA)
Cc: wayne.eberhard@Cummins.com; hans.schlamadinger@Cummins.com; [A..Keith.McIntire"@Cummins.com](mailto:A..Keith.McIntire)
Subject: Revised Memo - Cummins MY07 Firetruck Overheat AECD Modified Proposal
Date: 03/14/2006 09:55 AM
Attachments: [MY07 Firetruck AECD Request 8-Feb-2006 to EPA.doc](#)
[MY07 Firetruck AECD Request 19-Jul-2005 to EPA.doc](#)
[Fire Truck AECD Proposal 9-Apr-2003 re-creation .doc](#)
[8-May-2003 Cummins HH AECD letter re-creation.doc](#)
[MY05 High Load Factor Stationary AECD Request 6-Jan-2007 to EPA.doc](#)
[Q&A - MY05 High Load factor Stationary AECD to EPA 17Mar2005.doc](#)
[Stationary High Load Factor ISX&ISM Examples 7-Apr-2005.ppt](#)

Greg

We have been delinquent in following up on the below e-mail to discuss the MY07 Extreme Ambient Overheat AECDs. Cummins plans to utilize the AECDs as agreed with Rick Gezelle in principle in March 2005.

One change which was not reflected in the original July 2005 Proposal is one that was determined in the later July 26-27, 2005 Fire Apparatus Manufacturer's Association meeting in Washington, and discussed with EPA on July 27, 2005. The only change in position which is now proposed is one that we believe should be easy to achieve your concurrence.

The FAMA discussions led to an industry consensus to turn on the dashlamp at coolant temperatures above maximum top tank temperature.

The change is crudely reflected in this new (preliminary) version of the MY07 Fire Truck AECD Request ...

(See attached file: MY07 Firetruck AECD Request 8-Feb-2006_to_EPA.doc)

We would like to achieve closure with you on this proposal in anticipation of upcoming OEM vehicle validation testing. Greg, we would like to have your concurrence with the previous EPA decision (as voiced by Rick Gezelle). Please let us know of your acceptance of this proposal or if you have any questions. We can arrange a teleconference if you wish.

Attached for your convenience are the historical documents previously submitted. We consider all of this material to be Cummins Confidential Business Information. Your secure treatment of these documents is requested.

W. Wayne Eberhard
Director - Applied Controls
Cummins, Inc.
812-377-6351
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----- Forwarded by Wayne Eberhard/Auto/Cummins on 02/08/2006 05:00 PM -----

Wayne Eberhard	To: OREHOWSKY.GREGORY@EPAMAIL.EPA.GOV
07/20/2005 09:00 AM	cc: Victor A Schneider/Auto/Cummins@Cummins, Hans Schlamadinger/Ind/Cummins@Cummins, A. Keith McIntire/Auto/Cummins@Cummins
	Subject: Cummins MY07 Firetruck Overheat AECD Modified Proposal

I am attaching several documents which comprise a proposal for MY07 Overheat AECDs. This information can be useful for the upcoming Fire Apparatus Manufacturers' Association meeting.

I believe it would be helpful to compile the information in one location for easy reference.

Most of the material is historical and included for your information. We consider all of this material to be Cummins Confidential Business Information. Your secure treatment of these documents is requested.

The proposal for modification of previous Firetruck AECDs (new material)
(See attached file: MY07 Firetruck AECD Request 19-Jul-2005_to_EPA.doc)

The remaining documents are historical.

Enclosure A - The MY04 Firetruck AECD proposal
(See attached file: Fire_Truck_AECD_Proposal_9-Apr-2003_re-creation_.doc)

Enclosure B - The MY04 Heavy Hauler AECD proposal
(See attached file: 8-May-2003_Cummins_HH_AECD_letter_re-creation.doc)

Enclosure C - The MY05 High Load Factor Stationary AECD proposal
(See attached file: MY05 High Load Factor Stationary AECD Request 6-Jan-2007_to_EPA.doc)

Enclosure D - The Questions and Answers regarding MY07 ongoing challenge
(See attached file: Q&A - MY05 High Load factor Stationary

AECD_to_EPA_17Mar2005.doc)

Enclosure E - High Load Factor Stationary AECD Examples
(See attached file:
Stationary_High_Load_Factor_ISX&ISM_Eamples_7-Apr-2005.ppt)

Respectfully submitted,

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